

Kevin H. Sharp

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
)	NO. 3:11-cr-00249-1
v.)	
)	JUDGE SHARP
KEVIN DEWITT BRAME, JR)	

UNOPPOSED MOTION TO EXTEND DEADLINE FOR FILING MOTIONS TO SUPPRESS

Kevin Brame, Jr., through counsel and without opposition from the government, moves the Court to extend the deadline for filing motions to suppress currently set for August 24, 2013 until September 9, 2013 (16 days). In support defendant files the attached declaration of counsel and would show:

1. Defendant is indigent. Trial is scheduled for October 8, 2013. August 24, 2013 is the defendant's deadline for filing suppression motions (D.E. 130).

2. Counsel requests the August 24, 2013 suppression motion deadline be extended until September 9, 2013. Defendant is detained pretrial in federal custody, housed in Robertson County Detention Center (RCDC), Springfield, Tennessee. Additional time is necessary to meet with Mr. Brame at RCDC and complete discussion of suppression issues to determine whether motions, if any, will be filed on his behalf. Additional time is necessary for effective assistance of counsel.